



Richman & Richman LLC

Michael P. Richman

122 W Washington Ave Suite 850  
Madison, WI 53703-2732  
608.630.8990  
mrichman@randr.law

April 16, 2024

*Via CM/ECF*

Honorable G. Michael Halfenger  
Chief United States Bankruptcy Judge  
United States Bankruptcy Court  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 140  
Milwaukee, WI 53202

RE: In re: Wisconsin & Milwaukee Hotel LLC,  
Case No. 24-21743 – Proposed Interim Cash Collateral Order

Dear Judge Halfenger:

I am writing as proposed counsel to the Debtor in the referenced matter to advise the Court that the proposed Interim Order Authorizing the Use of Cash Collateral, Granting Adequate Protection, and Scheduling Hearing on Final Authorization of Use of Cash Collateral, filed today [Doc 32], is the subject of ongoing negotiations between the Debtor and Computershare Trust Company (as assignee of Wisconsin Housing and Economic Development Authority).

In the event we are able to reach an agreement to resolve the related motion prior to the First Day hearings scheduled to be held tomorrow at 1:45 p.m., we will file a new and updated proposed order.

Respectfully,

RICHMAN & RICHMAN LLC

Michael P. Richman  
MPR/hms